

# **EXHIBIT A**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively  
Consolidated SIPA Liquidation of Bernard L. Madoff  
Investment Securities LLC and Bernard L. Madoff,

Plaintiff,

v.

DEFENDANTS IN ADVERSARY PROCEEDINGS  
LISTED ON EXHIBIT A ATTACHED HERETO,

Defendants.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. Nos. listed on Exhibit A  
Attached Hereto

**[PROPOSED] ORDER GRANTING IN PART AND DENYING IN PART  
TRUSTEE'S MOTION FOR LIMITED ADDITIONAL DISCOVERY**

On September 21, 2018, Irving H. Picard, trustee ("Trustee") for the substantively consolidated liquidation of Bernard L. Madoff Investment Securities LLC ("BLMIS") under the Securities Investor Protection Act, 15 U.S.C. § § 78aaa *et seq.* ("SIPA"), and the estate of Bernard L. Madoff ("Madoff") (collectively, "Debtor"), by and through his counsel, filed the Motion and Memorandum of Law For Limited Additional Discovery Based on Prior Orders Authorizing Deposition of Bernard L. Madoff (the "Motion"), ECF No. 18015.

On February 15, 2019, the Court issued the Memorandum Decision Regarding Trustee's Motion for Additional Discovery Based on the Deposition Testimony of Bernard L. Madoff (the "Decision"), attached hereto as Exhibit B. ECF No. 18480.

It is hereby **ORDERED** that:

1. The deposition of FBI special agent Theodore Cacioppi shall be completed by May 30, 2019; the details of the deposition, including precise date, location, and procedure are subject to coordination with the United States Attorney's Office for the Southern District of New York;
2. Expert reports shall be served by June 14, 2019;
3. Rebuttal expert reports shall be served by ~~July 29, 2019~~ October 20, 2019;
4. Expert Discovery shall be completed by ~~August 28, 2019~~ December 1, 2019;
5. Except as set forth in paragraphs 1 through 4 of this Order, the remainder of the Motion is denied in the adversary proceedings listed on Exhibit A;
6. The Court, in its discretion, may impose sanctions on any person or entity that violates any provision of this Order;
7. The terms of this Order may be modified only upon a showing of good cause; and
8. This Court shall retain exclusive jurisdiction over the enforcement, implementation, and interpretation of this Order.

Dated: New York, New York  
\_\_\_\_\_, 2019

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HONORABLE STUART M. BERNSTEIN  
UNITED STATES BANKRUPTCY JUDGE

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